

FACT SHEET

PR#0235

**NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT
FACT SHEET FOR A DRAFT PERMIT RENEWAL
HAWTHORNE ARMY DEPOT HAZARDOUS WASTE FACILITY
EPA ID #NV1210090006
DRAFT PERMIT NUMBER NEV HW0017**

The Nevada Division of Environmental Protection (NDEP) has developed this FACT SHEET for the draft Resource Conservation and Recovery Act (RCRA) Permit which NDEP intends to renew for the Hawthorne Army Depot in Mineral County, Nevada. This FACT SHEET has been prepared in accordance with the public notice requirements of Nevada Administrative Code (NAC) 444.8632 and Chapter 40 Code of Federal Regulations (CFR) Section 124.8. The purpose of this FACT SHEET is to provide interested citizens and other governmental agencies a summary description of the principal facts and significant issues NDEP has considered in preparing the draft permit.

FACILITY DESCRIPTION

The Hawthorne Army Depot (HWAD) is located on 148,517 acres of withdrawn federal land south of Walker Lake in Mineral County, Nevada. HWAD is a conventional munitions depot which supports the major military services (Army, Air Force, Navy, and Marines) with facilities to receive, load, maintain, store, and issue ammunition and explosive ordnance items. HWAD also has responsibility for renovating, recovering, or disposing of unserviceable ammunition and explosives. In the course of these activities, hazardous wastes are generated throughout the depot. The facility contains the following hazardous waste management units: 1) a hazardous waste incinerator (RF-9), which is a cylindrical rotary-kiln type furnace with an afterburner and air pollution control system; 2) a Plasma Arc Demilitarization System incinerator (PODS) which consists of a plasma furnace with air pollution control equipment and a water treatment system; 3) four hazardous waste container storage units; 4) eight hazardous waste military munitions (WMM) container storage units; and 5) one open burn unit. The government contractor (Day & Zimmermann Hawthorne Corporation (DZHC)) will operate the hazardous waste management units.

NDEP initially issued HWAD a RCRA permit for units 1, 3, 4 and 5 above in September 1997. However unit 1, RF-9, was never in operation due to lack of Air permit. The RCRA permit was modified in August 2002 to add unit 2, the PODS. The PODS has been constructed and is in the process of being started up. The RCRA permit expired in September 2002. However, HWAD is currently operating under the conditions of the expired permit under the provisions of 40 CFR 270.51.

RF-9 will treat containerized obsolete and unserviceable munitions (explosives and propellants) considered RCRA characteristic hazardous waste either by reactivity or toxicity and is located in Building 117-3 in the WADF area.

PODS will treat pyrotechnic and other ordnance considered RCRA characteristic hazardous waste either by reactivity or toxicity and is located in Building 117-2 in the WADF area.

The facility hazardous waste container storage buildings are all modified concrete military storage magazines and are located at the following buildings: 106-22, 106-23, 115-9, and 113-73A. All buildings are totally enclosed and buildings 106-22 and 106-23, which may be used to store containerized liquid wastes, have epoxy-sealed concrete floors with containment berms. Bldgs. 106-22 and 106-23 will be permitted to store a wide range of hazardous wastes (non-munitions) that include toxic, ignitable, and corrosive materials. Bldg. 106-22 has a maximum storage capacity of 1,620 55-gallon drums while Bldg. 106-23 has a maximum storage capacity of 1,344 55-gallon drums. The draft permit requires incompatible waste streams to be segregated. Buildings 115-9 and 113-73A may only be used to store solid hazardous wastes. Building 115-9 will be permitted to store only reactive wastes, including waste explosives and wastes generated from the on-site explosives wastewater treatment plant. Bldg. 115-9 has a maximum storage capacity of 624 55-gallon drums. Bldg. 113-73A will be permitted to store explosives contaminated soils and has a maximum storage capacity of 384 55-gallon drums (equivalent volume).

The facility hazardous WMM storage buildings are all concrete military storage magazines and are located at the following buildings: 116-37, 116-38, 116-39, 116-41, 116-42, 116-43, 116-44, and 116-45. These buildings each have a maximum storage capacity of 384 55-gallon drums (equivalent volume) and will be used solely for storing munitions which are intended for treatment at on-site (PODS, RF-9, and Old Bomb Unit) or off-site RCRA authorized Treatment, Storage, and Disposal Facilities.

The open burn unit (Old Bomb Unit) is located within the boundaries of the HWAD facility in the southern part of the installation (south of the South Magazine Area). The Old Bomb Unit consists of four burn pads located at least 150 feet apart, each containing five steel burn pans, and covers a 6.5 acre area surrounded by an on-site depot buffer area of 300 acres. HWAD will treat propellants by open burning at Old Bomb that are unstable and for safety reasons cannot be reused, recycled, or reutilized or processed through the RF-9 incinerator. Waste propellants treated (i.e., open burned) at the Old Bomb unit must also satisfy the criteria specified by the Air Quality Operating Permit issued in accordance with NAC 445B.316 unless otherwise approved by the Administrator in accordance with NAC 445B.22067(2)(a). The Old Bomb Unit has a maximum treatment capacity of: 20,000 lbs of Net Explosive Weight/day and 3,900,000 lbs of Net Explosive Weight /yr of waste propellant. This capacity may be limited further due to presence of adverse meteorological conditions (high or low wind speed, cloud cover, visibility, precipitation).

HWAD has conducted, with the oversight of NDEP and US Environmental Protection Agency Region IX, a site-specific multipathway human health and ecological screening level individual risk assessment for PODS and RF-9 incinerator emissions. According to the results of the risk assessment, the incinerators can be operated as proposed in the draft permit without exposing residents, on-site workers, or the surrounding wildlife to unsafe levels of hazardous chemicals.

HWAD also conducted a multipathway health and ecological risk assessment for the Old Bomb Unit. The assessment has concluded that the Old Bomb Unit can be operated as proposed in the draft Permit

without exposing residents, on-site workers, or the surrounding wildlife to unsafe levels of hazardous chemicals.

RCRA Risk Burns will be conducted for PODS and RF-9 to collect data for cumulative (combined) Health and Ecological Risk Assessment involving PODS, RF-9 and Open Burn units. The draft PERMIT also stipulates that the Permittee can operate simultaneously only those units for which a cumulative Risk Assessment has been performed.

Due to historical releases of hazardous chemicals at the depot, over 25 sites require further investigation and/or remediation activities. Through the Department of Defense Installation Restoration Program (IRP), with oversight from NDEP, HWAD has initiated corrective action investigations and/or cleanup activities at most of these sites. The draft permit, which refers to these sites as Solid Waste Management Units (SWMUs), contains (in Part V) an enforceable schedule and requirements for future investigation and remedial activities.

BASIS FOR THE DRAFT PERMIT CONDITIONS

The draft permit conditions are proposed under the authority of Section 3006 of the Resource Conservation and Recovery Act (RCRA) (Chapter 40 Code of Federal Regulations codified in part 271), 40 CFR Parts 124, and 260 through 270, Nevada Revised Statutes (NRS) 459.20 and Nevada Administrative Code (NAC) 444.842 through 444.8746, 444.940 through 444.9555, and 444.960. These laws and regulations govern the management of hazardous wastes in the state of Nevada. NDEP, as the authorized permitting agency for the state of Nevada, has reviewed the permit renewal application submitted by HWAD and has determined that the facility can be operated under the draft permit conditions in accordance with applicable regulations and in a manner which is protective of public health and the environment.

In addition to unit-specific operation and maintenance requirements the draft permit also contains provision for: accurate waste analysis to ensure proper management of hazardous waste; contingency plan and preparedness requirements to prevent and respond to releases of hazardous waste; personnel training requirements; inspection and record-keeping requirements; and unit-specific closure requirements. HWAD will also be required to continue operation of the Western Area Demilitarization Facility (WADF) as a condition of the draft permit. At WADF, HWAD operates facilities to recycle, renovate, and reuse explosives that can no longer be used for their intended purpose.

PROCEDURES FOR REACHING A FINAL DECISION

Section 7004(b) of RCRA, NAC 444.8632, and 40 CFR Section 124.10 require that the public and interested agencies be given at least forty-five (45) days to comment on each draft Permit prepared under RCRA. The comment period for the Hawthorne Army Depot (HWAD) draft permit will end on **August 30, 2004**. Any person interested in commenting on the application or draft permit must do so within this forty-five day comment period.

Persons should submit written comments concerning the permit conditions or requests to be on the NDEP's mailing list to the following address:

**Mr. Sree Kailash, P.E.
Bureau of Waste Management
Nevada Division of Environmental Protection
333 W. Nye Lane
Carson City, NV 89706-0851**

Comments should include all reasonably available references, factual grounds, and supporting material.

A public hearing will be held to hear further comments if a written notice of opposition is received and a request for such a hearing is submitted by **August 30, 2004**. In the event that such a public hearing is requested, a time and place for the meeting will be scheduled and announced in a separate public notice at least thirty (30) days prior to the hearing.

NDEP will respond in writing to all comments received during the public comment period and statements heard at a public hearing, in the event one is held, when making a final decision.

The ADMINISTRATIVE RECORD for the DRAFT PERMIT, which includes the APPLICATION (INCLUDING RISK ASSESSMENTS FOR THE RF-9 INCINERATOR, PODS INCINERATOR AND OLD BOMB UNIT), AGENCY AND APPLICANT CORRESPONDENCE AND MEMORANDA, DRAFT PERMIT, and FACT SHEET, are available for public review between the hours of 8:00 a.m. and 3:00 p.m., Monday through Friday at the NDEP address given above. The compliance history of the applicant may also be viewed during the same hours and location given above. Further information and copies of the FACT SHEET may be obtained by calling Sree Kailash of NDEP at (775) 687-9471.

A copy of the DRAFT PERMIT may also be viewed at the Mineral County Library located at 1st and A St., Hawthorne, NV 89415, (775) 945-2778.

When NDEP makes a final decision to either issue or deny the permit, notice will be given to HWAD and to each person who has submitted written comments or requested a notice of the final decision. The final permit decision shall become effective thirty (30) days after service of notice of the decision unless a later date is specified or review is requested under NAC 444.8632 and 40 CFR Section 124.19 or an appeal of the NDEP Administrator's decision is brought to the State Environmental Commission under NRS 445.274. If no comments requested a change in the draft permit, the final permit shall become effective immediately upon issuance.